

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

CITY OF FORT LAUDERDALE POLICE
AND FIREFIGHTERS' RETIREMENT
SYSTEM, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

PEGASYSTEMS INC., ALAN TREFLER, and
KENNETH STILLWELL,

Defendants.

Case No. 1:22-cv-00578-LMB-IDD

CLASS ACTION

**DECLARATION OF PAUL M. FALABELLA IN SUPPORT OF MOTION OF
GENERAL RETIREMENT SYSTEM OF THE CITY OF DETROIT
FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF LEAD COUNSEL**

I, Paul M. Falabella, hereby declare as follows:

1. I am an attorney with the law firm Butler Curwood PLC, counsel for proposed Lead Plaintiff General Retirement System of the City of Detroit ("Detroit GRS") and proposed Local Counsel for the class in the above-captioned action. I make this declaration in support of the Motion of General Retirement System of the City of Detroit for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits.

Exhibit A: Notice of Pendency of class action published in *Globe Newswire* on May 19, 2022;

Exhibit B: General Retirement System of the City of Detroit's Sworn Certification;

Exhibit C: The firm resume of Abraham, Fruchter & Twersky, LLP; and

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of July, 2022.

/s/ Paul M. Falabella

PAUL M. FALABELLA

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to counsel of record.

/s/ Paul M. Falabella
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